

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI INC., *et al.*,

Defendants.

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DAILY NEWS, *et al.*,

Plaintiffs,

v.

MICROSOFT CORPORATION, *et al.*,

Defendants.

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THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., *et al.*,

Defendants.

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No. 1:23-cv-11195-SHS-OTW  
No. 1:24-cv-03285-SHS-OTW  
No. 1:24-cv-04872-SHS-OTW

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Allison S. Blanco, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings LLC, (together, “OpenAI”).

I am a member in good standing of the Bar of the State of California, and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: February 27, 2025  
Los Angeles, CA

Respectfully Submitted,

**LATHAM & WATKINS LLP**

/s/ Allison S. Blanco

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*Attorneys for OpenAI*